UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

DYNAMIC DATA TECHNOLOGIES, LLC,

Plaintiff,

V

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Civil Action No. 2:18-cv-459

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND AND WAIVER OF SERVICE

COMES NOW, Plaintiff Dynamic Data Technologies, LLC ("Plaintiff") and files this Unopposed Motion for Extension of Time to Answer or Otherwise Respond and Waiver of Service and shows the Court as follows:

Plaintiff filed its Complaint against Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Defendants" or "Samsung") on November 2, 2018. Samsung Electronics America, Inc. was served on November 5 2018. The parties have met and conferred and respectfully request that the Court extend the deadline for Samsung Electronics America, Inc. to answer or otherwise respond to the Complaint up to and including February 25, 2019. In exchange for this extension, Samsung Electronics Co., Ltd. has agreed to waive formal service of the Complaint (under the Hague Convention). The parties thus agree that Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. will have until February 25, 2019 to answer or otherwise respond to the operative Complaint.

Dated: November 12, 2018 Respectfully submitted,

/s/ Elizabeth L. DeRieux_

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Attorneys for Dynamic Data Technologies, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who are deemed to have consented to electronic service on this 12th day of November, 2018. Any other counsel of record will be served this same day via electronic mail.

/s/ Elizabeth L. DeRieux

Elizabeth L. DeRieux